

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**
Nashville Division

Robin Black

Case No. 3:21-cv-00758

v.
BroadLeaf Marketing & SEO, LLC

Judge Aleta A. Trauger

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Rule 83.01 of the Local Rules of Court for the United States District Court Middle District of Tennessee, Max S. Morgan hereby moves for admission to appear *pro hac vice* in the above-captioned action as counsel for Plaintiff, Robin Black.

Pursuant to 29 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct:

1. I am a member in good standing of the United States District Court for the Eastern District of Pennsylvania. Attached is a Certificate of Good Standing from that court.

2. I am not, nor have I ever been, the subject of disciplinary proceedings by any disciplinary authority, court, or tribunal, except as provided below:

N/A

3. I have not been found in contempt by any court or tribunal, except as provided below:

N/A

4. I have not been sanctioned pursuant to 28 U.S.C. § 1927, except as provided below:

N/A

5. I have never been censured, suspended, disbarred, or denied admission or readmission by any court or tribunal, except as provided below.

N/A

6. I have not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below:

N/A

7. I understand that pursuant to Local Rule 83.01(d)(1), if I am not both a member of the Tennessee bar and admitted to the bar of this Court, local counsel must be retained. Below is the name, address, phone number, and e-mail address of local counsel retained in this matter:

David W. Garrison, Esquire
Barrett Johnston Martin & Garrison, LLC
414 Union Street, Suite 900, Nashville, TN 37219
(615) 244-2202; dgarrison@barrettjohnston.com

8. I have read and am familiar with Local Rules of Court for the United States District Court Middle District of Tennessee.

9. By seeking admission to practice before this Court, I acknowledge my responsibility for compliance with all rules of this Court and confer disciplinary jurisdiction upon this Court for any alleged misconduct arising in the course of the proceeding.

/s/ Max S. Morgan Signature

Name: Max S. Morgan

State where admitted and State Bar Number: Pennsylvania, 316096

Business Address: The Weitz Firm, LLC, 1528 Walnut St., 4th Floor, Philadelphia, PA 19102

Local Address [if different from above]:

Phone: 267-587-6240

Email: max.morgan@theweitzfirm.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of this *Motion for Admission Pro Hae Vice* was filed electronically with the Clerk's office by using the CM/ECF system and will be served via U.S. Mail on the registered agent for Defendant as listed below on October 14, 2021:

BROADLEAF MARKETING & SEO, LLC,
c/o Registered Agent
FORESIGHT FINANCIAL CPA FIRM PLLC
715 PARK OF COMMERCE DR
STE 128
BOCA RATON, FL 33487

/s/ David W. Garrison

DAVID W. GARRISON

BARRETT JOHNSTON

MARTIN & GARRISON, LLC